

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

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GPIF-I EQUITY CO., LTD. and :
GPIF-I FINANCE CO., LTD., :
v. :
Plaintiffs-Counterclaim Defendants, :
Case No. 13 Civ 547 (CM)
HDG MANSUR INVESTMENT SERVICES, INC., :
HDGM ADVISORY SERVICES, LLC, and :
HAROLD D. GARRISON :
Defendants-Counterclaim Plaintiffs. :
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HDG MANSUR INVESTMENT SERVICES, INC., :
and HDGM ADVISORY SERVICES, LLC, :
v. :
Third-Party Plaintiffs, :
HSBC SECURITIES (USA) INC. :
Third-Party Defendant. :
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**NOTICE OF MOTION FOR SUMMARY JUDGMENT ON DEFENDANTS'
COUNTERCLAIMS**

PLEASE TAKE NOTICE that, upon Plaintiffs' Memorandum of Law in Support of Their Motion for Summary Judgment on Defendants' Counterclaims, Plaintiffs' Rule 56.1 Statement of Material Facts, and the Declaration of Deborah Hazell (and exhibits thereto), Plaintiffs will move this Court before the Honorable Colleen McMahon, United States District Judge for the Southern District of New York, at the United States Courthouse, 500 Pearl Street, New York, New York 10007, on a date to be determined, for an order granting Plaintiffs summary judgment against HDG Mansur Investment Services, Inc. and HDGM Advisory Services, LLC ("Defendants") on Defendants' counterclaims for breach of contract and for an accounting.

Dated: New York, New York
September 16, 2013

**WILMER CUTLER PICKERING
HALE AND DORR LLP**

By: /s/ Charles C. Platt
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Ltd. and GPIF-I Finance Co., Ltd.*